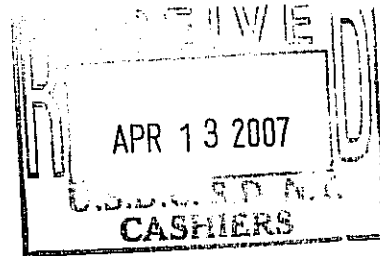


**LE DUCHWALD**

**FRIEDMAN & JAMES LLP**

Attorneys for Plaintiff  
132 Nassau Street  
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BF-9219

**07 CV 2980**



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THOMAS KEEGAN,

Plaintiff,

-against-

THE CITY OF NEW YORK,

Defendant.

**PLAINTIFF DEMANDS  
A TRIAL BY JURY**

**COMPLAINT**

**SEAMAN'S CASE UNDER  
THE JONES ACT FOR  
PERSONAL INJURIES**

**SUITS UNDER SPECIAL RULE FOR SEAMEN TO  
SUE WITHOUT SECURITY OR PREPAYMENT OF  
FEES FOR THE ENFORCEMENT OF THE LAWS  
OF THE UNITED STATES, COMMON AND STAT-  
UTORY FOR THE PROTECTION OF AND FOR  
THE HEALTH AND SAFETY OF SEAMEN AT SEA**

Plaintiff THOMAS KEEGAN, complaining of the defendant THE CITY OF NEW YORK, by his attorneys FRIEDMAN & JAMES LLP, respectfully alleges as follows:

1. Upon information and belief, at all times hereinafter mentioned, defendant THE CITY OF NEW YORK was a municipal corporation with offices within the State of New York and City of New York.

2. At all times and dates hereinafter mentioned, the defendant THE CITY OF NEW YORK owned the LAUNCH 36.

3. At all times hereinafter mentioned, the defendant THE CITY OF NEW YORK operated the LAUNCH 36.

4. At all the times and dates hereinafter mentioned, the defendant THE CITY OF NEW YORK controlled the LAUNCH 36.

5. At all times and dates hereinafter mentioned, the plaintiff was a member of the crew of the LAUNCH 36 and an employee of the defendant.

6. That on or about April 15, 2004, without any fault on the part of the plaintiff, and wholly and solely by reason of the negligence, recklessness and carelessness of the defendant THE CITY OF NEW YORK, its agents, servants and/or employees, and by reason of the unseaworthiness of its vessel, the plaintiff was caused to sustain injuries.

7. As a result of the foregoing, the plaintiff was rendered sick, sore, lame and disabled and sustained severe permanent personal injuries, was and is internally and externally disabled causing him to suffer pain, and for a time he was prevented from attending to his daily labors, thereby losing sums of money which he otherwise would have earned as wages, and has endeavored to be cured of his injuries, and has expended sums of money to maintain himself, and will continue to endure pain and suffering, all to his damage.

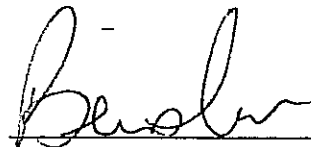
8. By reason of the foregoing, plaintiff has been damaged in the sum of SEVEN HUNDRED FIFTY THOUSAND (\$750,000.00) DOLLARS.

**WHEREFORE**, plaintiff THOMAS KEEGAN demands judgment against defendant THE CITY OF NEW YORK in the First Count in the sum of SEVEN HUNDRED FIFTY THOUSAND (\$750,000.00) DOLLARS; together with interest and costs.

Dated: New York, New York  
April 13, 2007

**FRIEDMAN & JAMES LLP**  
Attorneys for Plaintiff

By:

A handwritten signature in dark ink, appearing to read 'Bernard', is written over a horizontal line.

Bernard D. Friedman (BF-9219)  
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